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December 19, 2024

**By ECF Filing**

Honorable Katherine Polk Failla  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

Re: Richard v. Combs, et al., Case No. 24 Civ. 6848

Dear Judge Failla:

This firm represents defendants New Remote Productions Inc. and Remote Productions Inc. (collectively, the “Remote Defendants”). We write on behalf of all remaining defendants to respectfully request that the Court adjourn the initial conference currently scheduled for January 9, 2025. We have conferred with Plaintiff’s counsel who takes no position on this request.

We make this request for several reasons, but principally because the deadline for the Combs Defendants to answer or otherwise respond to the Complaint is January 22, 2025, which is after the currently scheduled conference.<sup>1</sup> Your Honor previously adjourned the initial conference scheduled for November 7, 2024, because of, *inter alia*, “anticipation of a number of pre-motion letters.” (Dkt. 67.) Your Honor likewise adjourned the two pre-motion conferences previously scheduled for November 21, 2024 and December 5, 2024 because of the “Court’s strong preference to defer pre-motion conferences until after all Defendants have responded to the Complaint,” but did not adjourn any other deadlines, including the January 9 conference. (Dkt. 96.)

Given the Court’s prior stated preference to wait until all defendants have responded to the complaint to hold a conference, as well as Plaintiff’s representations that she intends to withdraw claims and amend her complaint, we respectfully request that the Court adjourn the January 9 conference to a date convenient to the Court after January 22, 2025, which is the last response

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<sup>1</sup> The “Combs Defendants” are: Sean Combs, Daddy’s House Recordings, Inc. (incorrectly sued as Daddy’s House Recording Studio), Bad Boy Entertainment LLC, Bad Boy Records LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., 1169 Corp. f/k/a Sean Combs Music Inc. (incorrectly sued as The Sean Comb Music Inc.), Sean Combs Capital LLC, CE OpCo, LLC f/k/a Combs Enterprises LLC (incorrectly sued as Combs Enterprises LLC), 1 Combs Wines and Spirits LLC, Janice Combs Publishing LLC (incorrectly sued as Janice Combs Publishing Inc.), Janice Combs Publishing Holdings, Inc., and Love Records, Inc.

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deadline for a remaining defendant who has appeared in this case. We further note that discovery has not yet begun and no other case deadlines would be affected by this requested adjournment.

This is the second request for adjournment of the initial conference.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/Roy P. Salins

Roy P. Salins

cc: All counsel of record via ECF  
Chambers (file stamped copy by e-mail at [Failla\\_NYSDChambers@nysd.uscourts.gov](mailto:Failla_NYSDChambers@nysd.uscourts.gov))